



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

TF/NEM
F.# 2015R00173

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 20, 2015

By FEDEX and ECF

Andrew M. Lankler, Esq.
Baker Botts LLP
30 Rockefeller Plaza
New York, NY 10112-4498

Re: United States v. Gregg Mulholland, et al.
Criminal Docket No. 14-476 (S-1) (ILG)

Dear Mr. Lankler:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby provides discovery in the above-captioned matter. The materials in this production are contained on one compact disc and are Bates-numbered TT-PRIV-0000000000001 through EDNY-TT-PRIV-0000000000889. Please also consider this letter to be the government's request for reciprocal discovery.

This letter discloses documents provided to the government by a cooperating witness ("CW-1"), and supplements the government's earlier disclosure under cover of letter dated August 10, 2015 of documents from the same witness.

Because the government anticipated that materials provided by CW-1 may contain attorney-client privileged information, the government instituted firewall procedures in reviewing them. A firewall team of the undersigned Assistant United States Attorneys (the "firewall team") reviewed the documents provided by CW-1 and divided them into non-privileged and privileged categories. The non-privileged materials were provided to the prosecutors and agents involved in the investigation and prosecution of this matter (the "prosecution team"), including Assistant United States Attorneys Jacquelyn M. Kasulis, Winston M. Paes, and Michael T. Keilty, for their review. The prosecution team disclosed those materials to you on August 10, 2015. (Please note that a portion of one email contained herein, EDNY-TT-PRIV-0000000000702-703, was previously disclosed on August 10, 2015.) The prosecution team did not review the materials that had been withheld by the firewall team as privileged (the "firewall materials"), nor have they been made aware of the contents of those materials. The government here provides to you those firewall materials which the government has determined can be disclosed to your client; these are

communications between officers of Legacy Global Markets S.A. and an attorney. Should you have any questions about any of the firewall materials, please contact the undersigned.

Very truly yours,

KELLY T. CURRIE
Acting United States Attorney

By: /s/
Tali Farhadian
Nadia E. Moore
Assistant U.S. Attorneys
(718) 254-6290/6362

cc: Clerk of the Court (ILG) (by ECF)
Eugene E. Ingoglia, Esq. (Counsel for Robert Bandfield) (by ECF)